

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR  
9004-1(b)**

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In Re:

**LTL MANAGEMENT, LLC,<sup>1</sup>**

Debtor.

Chapter 11

Case No.: 21-30589 (MBK)

Honorable Michael B. Kaplan

**[PROPOSED] CERTIFICATION FOR DIRECT APPEAL TO THE  
UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT**

Upon consideration of the *Request of Official Committee of Talc Claimants I for Order Certifying Direct Appeal to the United States Court of Appeals for the Third Circuit* (the “Request”) filed by the Official Committee of Talc Claimants I (“TCC I”) for certification for direct appeal to the Third Circuit Court of Appeals (the “Third Circuit”) of TCC I’s pending appeals (the “Appeals”) of the *Memorandum Opinion* (Dkt. 1572); the *Order Denying Motions to Dismiss* (Dkt. 1603); the *Memorandum Opinion* (Adv. 21-03021, Dkt. No. 184); and the *Order (I) Declaring That Automatic Stay Applies to Certain Actions Against Non-Debtors and (II) Preliminarily Enjoining Certain Actions* (Adv. 21-03021, Dkt. No. 187) (collectively, the “Memoranda and Orders”), and all papers filed in support of and in opposition to the Request, and the oral argument on the Request held on March 30, 2022, and all prior proceedings herein, and finding good cause for the requested certification; and upon due consideration, the Court hereby finds as follows:

1. the Memoranda and Orders involve matters of public importance requiring certification for direct appeal to the Third Circuit;

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<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

2. the Memoranda and Orders involve questions of law for which there is no controlling decision of the Third Circuit or the United States Supreme Court; and

3. an immediate appeal from the Memoranda and Orders may materially advance the progress of this case or these proceedings.

Based on the foregoing, and for good cause shown:

**IT IS HEREBY ORDERED** that, pursuant to 28 U.S.C. § 158(d)(2) and Rule 8006 of the Federal Rules of Bankruptcy Procedure, TCC I's Appeals of the *Memorandum Opinion* (Dkt. 1572); the *Order Denying Motions to Dismiss* (Dkt. 1603); the *Memorandum Opinion* (Adv. 21-03021, Dkt. No. 184); and the *Order (I) Declaring That Automatic Stay Applies to Certain Actions Against Non-Debtors and (II) Preliminarily Enjoining Certain Actions* (Adv. 21-03021, Dkt. No. 187), are hereby certified for direct appeal to the United States Court of Appeals for the Third Circuit.

Dated: March \_\_\_, 2022

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HONORABLE MICHAEL B. KAPLAN  
UNITED STATES BANKRUPTCY JUDGE